## DEPARTMENT OF PUBLIC SERVICE REGULATION BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MONTANA

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IN THE MATTER OF MONTANA-DAKOTA	)	REGULATORY DIVISION
UTILITIES CO., Application for Authority to	)	
Increase Rates for Natural Gas service in the	)	DOCKET NO. D2012.9.100
State of Montana	)	

## DATA REQUESTS OF THE MONTANA CONSUMER COUNSEL

MCC-122 RE: Software GL Essentials Witness - Skabo

- a. What costs associated with this software package are incorporated in the 2012 per books numbers in total and as allocated/assigned to the Montana gas operation?
- b. What costs associated with this software package are incorporated into the test year in this case as known and measurable changes occurring in 2013 in total and as allocated/assigned to the Montana gas operation?
- c. Should this software package result in operational efficiencies and corresponding expense reductions? If so, how are these cost savings integrated into the test year in this case?

MCC-123 RE: 3GIS Mobile mapping system Witness - Skabo

- a. What costs associated with this mobile mapping system are incorporated in the 2012 per books numbers in total and as allocated/assigned to the Montana gas operation?
- b. What costs associated with this mobile mapping system are incorporated into the test year in this case as known and measurable changes occurring in 2013 in total and as allocated/assigned to the Montana gas operation?
- c. Should this new mobile mapping system result in operational efficiencies and corresponding expense reduction? If so, how are these cost savings integrated into the test year in this case?

MCC-124 RE: New service lines Witness - Skabo

The testimony (page 9, lines 5 - 10) indicates that from 2009 through 2011, 72% of the investment in service lines was related to growth. Please provide a breakdown of this investment by year from 2009 through 2011. Also, please update the breakdown of the investment in service lines between growth related and replacement for 2012 as available.

MCC-125 RE: Billings downtown office and remote warehouse Witness - Skabo

- a. When did the replacement of the downtown Billings office and the remote warehouse take place?
- b. What is the rate base amount reflected in this test year for the new combined office and operations center for the Rocky Mountain Region?
- c. What happened to the downtown office and remote warehouse that have been replaced?
- d. Should the new facility result in operational efficiencies and corresponding expense reduction? If so, how are the cost savings integrated into the test year in this case?

MCC-126 RE: JD Power & Associates Witness - Gardner

- a. Explain in detail why the Company decided to use an outside consultant rather than continue to monitor the customer satisfaction in house.
- b. Provide a schedule that show the total amount paid to JD Power & Associates during 2012 and the amount allocated/assigned to the Montana gas operation.
- c. Please indicate the amount included in the test year in this case related to payments to JD Power & Associates.

MCC-127 RE: Customer Care and Billing (CC&B)
Witness - Gardner

a. What costs associated with the CC&B are incorporated in the 2012 per costs in total and as allocated/assigned to the Montana gas operation?

- b. What costs associated with the CC&B are incorporated into the test year in this case as known and measurable changes occurring in 2013 in total and as allocated/assigned to the Montana gas operation?
- c. Should the CC&B result in operational efficiencies and corresponding expense reductions? If so, how are these expense reductions integrated into the test year in this case?

MCC-128 RE: CC&B Witness - Gardner

The testimony (page 6, lines 1 - 4) indicates there will be cost savings "once all Utility Group companies are utilizing the system..."

- a. When will all Utility Group companies be utilizing the system?
- b. At that time what will be the cost savings associated with the CC&B as allocated/assigned to the Montana gas operation?

MCC-129 RE: Pension Plans Witness - Jones

Did the change in the non-union (2009) and union (2011) pension plans impact the test year pension plan expense in the test year in this case? If so, by how much? If not, why not?

MCC-130 RE: Medical plan benefits Witness - Jones

- a. When did the change to the medical benefit plans that "...restructured and priced the medical benefit plans. . ." take place?
- b. Did these changes result in lower medical plan costs for the Montana gas operation? If so, how much? If not, why not?
- c. How much is the cost of service in this test year reduced as a result of these changes? Does this reduction reflect a full year of cost savings?

MCC-131 RE: Post-retirement benefit liability Witness - Jones

- a. Did the change to reduce the post-retirement benefit liability impact the test year expenses in this case? If so, by how much? If not, why not?
- b. Is the reduction, if any, in the test year expenses in this case for the change in the post-retirement benefit liability reflected for a partial year or a full year? If only for a partial year, explain why it should not be reflected for a full year.

MCC-132 RE: Billings landfill project Witness - Morman

What happened, if anything, with the approach to Rapid City, SD for a similar project?

MCC-133 RE: Billings landfill project Witness - Morman

The testimony (page 6, lines15 - 16) indicates that "To date Montana-Dakota has invested approximately \$11 million in the facility." What is the total revenue requirement impact of the Billings Landfill project reflected in the test year in this case? Please break down the revenue requirement impact by return on investment, depreciation expense, O&M expenses, other taxes and any other impact.

MCC-134 RE: Billings Landfill project Witness - Morman

The testimony (page 5, lines1-2) indicates that the "The studies indicated the gas could initially be developed for around \$6 per dkt..." What is the current actual cost per dkt of gas produced by the Billings Landfill project? Provide all work papers, analyses, memos and other documentation that support the actual cost per dkt.